

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF BIG RIVERS)	
ELECTRIC CORPORATION FOR A)	
CERTIFICATE OF PUBLIC CONVENIENCE AND)	
NECESSITY AUTHORIZING THE CONVERSION)	CASE NO.
OF THE GREEN STATION UNITS TO NATURAL)	2021-00079
GAS-FIRED UNITS AND AN ORDER)	
APPROVING THE ESTABLISHMENT OF A)	
REGULATORY ASSET)	

COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION
TO BIG RIVERS ELECTRIC CORPORATION

Big Rivers Electric Corporation (BREC), pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested herein is due on May 12, 2021. The Commission directs BREC to the Commission's March 16, 2020 and March 24, 2020 Orders in Case No. 2020-00085¹ regarding filings with the Commission. The Commission expects the original documents to be filed with the Commission within 30 days of the lifting of the current state of emergency. All responses in paper medium shall be appropriately bound, tabbed, and indexed. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the name of the witness responsible for responding to the questions related to the information provided. Each response shall be answered

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 16, 2020), Order at 5–6. Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 24, 2020), Order at 1–3.

under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

BREC shall make timely amendment to any prior response if BREC obtains information that indicates the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which BREC fails or refuses to furnish all or part of the requested information, BREC shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, BREC shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Provide all schedules and workpapers filed in this proceeding in Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible.
2. Refer to the Direct Testimony of Michael T. Pullen, Confidential Exhibit Pullen-2. Explain whether the differences in resource capacity were accounted for in BREC's evaluation, and if so, describe how the capacity differences were accounted for.

3. Refer to BREC's response to Attorney General's First Request for Information, Items 5 and 6. Explain whether the costs attributed to the Texas Gas Transmission, LLC pipeline construction were accounted for in the estimated costs for the proposed conversion.

a. If the costs were accounted for, identify where in the record the costs were accounted for, how much the costs are, and what the costs include.

b. If the costs were not accounted for, explain why not and provide the amount of the costs and what the costs include.

4. Explain whether the costs of purchasing gas for a converted natural gas unit at Green Station were accounted for in the estimated costs for the proposed conversation.

a. If the costs were accounted for, identify where in the record the costs were accounted for, how much the costs are, and what the costs include.

b. If the costs were not accounted for, explain why not and provide the amount of the costs and what the costs include.

5. Refer to Case No. 2020-00064,² Direct Testimony of Paul G. Smith, pages 25–26, BREC's response to Commission Staff's Request for Information from the Informal Conference of May 28, 2020, Item 1, and BREC's response to Commission Staff's Post-Hearing Request for Information, Item 2. Explain whether the proposed Green Station conversion will have an impact on the New TIER Credit and provide an updated annual Tier Credit Forecast for 2021 through 2029.

² Case No. 2020-00064, *Electronic Application of Big Rivers Electric Corporation for Approval to Modify Its MRSM Tariff, Cease Deferring Depreciation Expenses, Establish Regulatory Assets, Amortize Regulatory Assets, and Other Appropriate Relief* (Ky. PSC June 30, 2020).



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DATED MAY 04 2021

cc: Parties of Record

Case No. 2021-00079

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